

STEVEN G. KALAR
Federal Public Defender
Northern District of California
JENYA PARKMAN
Assistant Federal Public Defender
19th Floor Federal Building - Box 36106
450 Golden Gate Avenue
San Francisco, CA 94102
Telephone: (415) 436-7700
Facsimile: (415) 436-7706
Email: Jenya_Parkman@fd.org

Counsel for Defendant Shumpert

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,
Plaintiff,
v.
RANDALL ELIJAH SHUMPERT,
Defendant.

Case No.: CR 18-00582 VC

**DECLARATION OF CAROLYN
MORRIS-SHUMPERT IN SUPPORT
OF MOTION FOR COMPASSIONATE
RELEASE**

I, Carolyn Morris-Shumpert, declare the following:

1. I am Randall Shumpert's mother. I love Randall. I am looking forward for Randall to come stay with me because he would be a great help in my life right now.
2. I am 78 years old. I live alone in a second-floor, two-bedroom apartment in Fairfield, California. I do not have a car. In November 2019, I broke my ankle. Since then, I have had difficulty moving around. I also have diabetes. My ankle injury has been slow to heal in part because of my diabetes.
3. Before the pandemic, caregivers and therapists visited me three times per week

to assist with activities of daily living and medical issues. The caregivers helped me with laundry, shopping for groceries, taking out the garbage, and cleaning the apartment. The therapists helped me with physical therapy exercises for my ankle, taking baths, getting downstairs, and going on walks.

4. During this pandemic, I have been without the assistance of caregivers and therapists. I hope that Randall can move in with me and help me with what they used to do.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on December 18, 2020, in Fairfield, California.

Carolyn L. Morris-Shumpert
CAROLYN MORRIS-SHUMPERT